

EXHIBIT D



**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

JAMIE EDELKIND

**CRIMINAL NO.
04 - 10066 MEL**

AFFIDAVIT OF THOMAS H. L. CURTIS

I, Thomas H. L. Curtis, under the pains and penalties of perjury, state as follows:

1. I am currently employed as a residential real estate agent for the William Raveis Real Estate office in Hingham, Massachusetts. I have been employed as an agent for William Raveis since November 2004. I was previously employed as an agent in the Hingham office of Coldwell Banker. I have been a real estate agent in the Hingham area for just over three years. Most of my work has been related to sales of residential properties, although I have also ^{AM INVOLVED IN} ~~done~~ some limited commercial real estate work. The area covered in the Hingham offices of both William Raveis and Coldwell Banker includes most of the Massachusetts South Shore but there is a concentration in the towns of Hingham, Hull and Cohasset. I am fully familiar with residential properties in Hull, Massachusetts and the market for residential properties in Hull, Massachusetts.

2. In 1968 I received a Bachelor of Science degree in Economics, and in 1971, a Masters in Business Administration degree, from Fairleigh

Dickinson University. I spent most of my professional career in the oil industry. My experience in that industry included real estate activities. For several years, while employed by Tenneco, I was responsible for the evaluation and selection, and I participated in the negotiations for the purchase of sites for self service gas stations in the northeastern portion of the United States.

3. I am quite familiar with the residential property at 940 Nantasket Avenue in Hull, Massachusetts. In the fall and early winter of 2004, I examined the interior of the house on at least three occasions. On one of the occasions Linda Edelkind was present; on a second occasion, after Mrs. Edelkind had returned to Norway, I viewed the house with my colleagues at William Raveis. At that time the caretaker, Stephan, let us in. However, on the first occasion, Linda Edelkind gave me a key to the house as well as a combination to the outside gate. I continued in contact with Linda Edelkind by phone and fax until late December of 2004. At some point, additional locks were placed on the house and I could no longer gain entry to the interior. I have since viewed the premises from the outside several times. On May 14, 2005, I walked around the premises with Jamie Edelkind's counsel, Michael J. Liston. We could view the interior only through windows.

4. When I viewed the premises in the early fall of 2004 with Linda Edelkind, I was shown the full interior of the house as well as a thick binder of "before and after" photos reflecting ongoing improvements. It was abundantly clear that dramatic changes had been made to improve the premises, both inside and out.

5. The purpose in viewing the house was for the sale of the property. In late November or early December when I viewed the house with my

colleagues at William Raveis, it was the consensus that the house had a market value of up to \$4,000,000. When I subsequently informed Linda Edelkind that the William Raveis agency proposed to list the property at \$4,000,000 she plainly indicated a belief that the price was too low.

6. The real estate market in Hull has not changed in any dramatic way over the past year. Housing prices have generally remained flat. Counsel for Jamie Edelkind has asked me to express an opinion as to the fair market value of the house and grounds at the present time. In May when I visited the premises, and on subsequent occasions when I drove by the premises, I noted that there was some deterioration since the late fall of 2004. With that in mind, it is my opinion that the fair market value of the real estate at 940 Nantasket Avenue, Hull Massachusetts as of July 1, 2005, is in the range of \$3,700,000 to \$4,000,000.00. As a real estate agent, I would be pleased to list ^{this} property in that range.

Signed under the pains and penalties of perjury this 2nd day of July, 2005.

Thomas H. L. Curtis
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